

1 Brian R. Chavez-Ochoa (CA Bar No. 190289)  
2 brianr@chavezchoalaw.com  
3 Chavez-Ochoa Law Offices, Inc.  
4 Jean Street, Suite 4  
5 Valley Springs, CA 95252  
6 Telephone: (209) 772-3013

7 Johannes Widmalm-Delphonse (VA Bar No. 96040)\*  
8 jwidmalmdelphonse@adflegal.org  
9 Alliance Defending Freedom  
10 44180 Riverside Parkway  
11 Lansdowne, VA 20176  
12 Telephone: (571) 707-4655

13 Jonathan A. Scruggs (AZ Bar No. 030505)\*  
14 jscruggs@ADFlegal.org  
15 Alliance Defending Freedom  
16 15100 N. 90th Street  
17 Scottsdale, AZ 85260  
18 Telephone: (480) 444-0020

19 *Counsel for Plaintiffs The Babylon Bee, LLC*  
20 and Kelly Chang Rickert

21 \*Admitted pro hac vice

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christopher Kohls,

Case No. 2:24-cv-02527-JAM-CKD

Transcriber,

**STIPULATION AND ORDER TO  
STAY ENFORCEMENT OF AB  
2655**

Rob Bonta, et al.,

## Defendants.

**Judge:** John A. Mendez

The Babylon Bee, LLC, et al.

## Plaintiffs,

V.

Rob Bonta, et al.

### Defendants.

## STIPULATION

1. Defendants Rob Bonta and Shirley N. Weber agree to stay enforcement of AB 2655 (Cal. Elec. Code § 20510) during the law's operative dates for the 2024 election cycle, from January 1-4, 2025.

2. In light of this stipulation, Plaintiffs will not seek a preliminary injunction staying enforcement of AB 2655 during the 2024 election cycle. Plaintiffs reserve the right to bring a motion for preliminary injunction should enforcement later become a possibility which, absent a dispositive ruling from this Court, will occur no later than late 2025 due to primary elections for the 2026 election cycle.

1 DATED: November 14, 2024  
2

3 s/ Johannes Widmalm-Delphonse

4 Johannes Widmalm-Delphonse  
VA Bar No. 96040  
5 Alliance Defending Freedom  
44180 Riverside Parkway  
6 Lansdowne, VA 20176  
571-707-4655  
7 jwidmalmdelphonse@adflegal.org

8 Jonathan A. Scruggs  
9 AZ Bar No. 030505  
Alliance Defending Freedom  
10 15100 N. 90th Street  
Scottsdale, AZ 85260  
480-444-0020  
12 jsruggs@ADFlegal.org

13 Brian R. Chavez-Ochoa  
CA Bar No. 190289  
Chavez-Ochoa Law Offices, Inc.  
15 4 Jean Street, Suite 4  
Valley Springs, CA 95252  
209-772-3013  
17 brianr@chavezochoalaw.com

18 *Counsel for Plaintiffs The Babylon Bee,  
LLC and Kelly Chang Rickert*

19 s/ Adam E. Schulman

20 (authorized 11.8.24)  
Adam E. Schulman  
Theodore H. Frank  
Hamilton Lincoln Law Institute  
1629 K Street NW, Suite 300  
Washington, DC 20006  
610-457-0856  
703-203-3848  
adam.schulman@hlli.org  
ted.frank@hlli.org

21 *Counsel for Plaintiff Christopher Kohls*

22 s/ Kristin A. Liska

23 (authorized 11.13.24)  
Rob Bonta  
Attorney General of California  
Anya M. Binsacca  
Supervising Deputy Attorney General  
Kristin A. Liska  
Deputy Attorney General  
State Bar No. 315994  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 510-3916  
Fax: (415) 703-5480  
E-mail: Kristin.Liska@doj.ca.gov

24 *Counsel for Defendants Robert A. Bonta  
and Shirley N. Weber*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christopher Kohls,  
Plaintiff,  
v.  
Rob Bonta, et al.,  
Defendants.

Case No. 2:24-cv-02527-JAM-CKD

## **ORDER TO STAY ENFORCEMENT OF AB 2655**

**Judge:** John A. Mendez

The Babylon Bee, LLC, et al.

## Plaintiffs,

V.

Rob Bonta, et al.

### Defendants.

Before the Court are Plaintiff Christopher Kohls, Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert and Defendants Rob Bonta and Shirley N. Weber's joint stipulation to stay enforcement of AB 2655.

The Court thus hereby ORDERS Defendants Rob Bonta and Shirley N. Weber to stay of enforcement of AB 2655 during the 2024 election cycle, from January 1-4, 2025.

It is so ORDERED.

Dated: November 15, 2024

/s/ John A Mendez

---

**THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE**